



**SEALED**

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FILED.

DATED: 2:46 pm, December 10, 2021

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUIGI J. MONTES,

ALEXANDER HOYOS RIVERA, and

PETER ALEXANDER STINCER,

Defendants.

Case No. 2:21-mj- 01027-DJA

**GOVERNMENT'S MOTION  
TO SEAL COMPLAINT**

**(Filed Under Seal)**

The United States of America, by and through Christopher Chiou, Acting United States Attorney, and Jim W. Fang, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, together with this Motion and the Court's Sealing Order, in the above-captioned matter until such time as the Court, or another Court of competent jurisdiction, shall order otherwise.

It is necessary for the Complaint in this case to be sealed in light of the fact that it makes reference to information regarding an on-going investigation. Public disclosure of the information in the Complaint might possibly jeopardize the investigation because all three defendants are not yet in custody. If they were to find out that federal law enforcement

1 officers were attempting to effectuate their arrests, defendants may attempt to flee, hide, or  
2 otherwise make their arrests more difficult or impossible. They may also make preparations  
3 to actively resist arrest, potentially placing law enforcement officers in danger, as well as  
4 destroy evidence they may have in their possession related to their criminal conduct.

5 To facilitate defendants' arrests, the Government respectfully requests that this Court  
6 grant the Government's motion and seal the Complaint in this case, as well as this Motion  
7 and the Court's Order on this Motion.

8 DATED this 10th day of December, 2021.

9 Respectfully submitted,  
10 CHRISTOPHER CHIOU  
Acting United States Attorney

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12 JIM W. FANG

13 Assistant United States Attorney  
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Defendants.

Case No. 2:21-mj- 01027-DJA


**Order Granting Government's Motion to Seal Complaint**

**(Filed Under Seal)**

Based on the pending Motion of the Government, and good cause appearing, IT IS  
HEREBY ORDERED that the Complaint, the Motion, and this Court's Sealing Order in  
the above-captioned matter shall be sealed until further Order of the Court.

DATED this 10<sup>th</sup> day of December, 2021.



  
HONORABLE DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE